

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHEET METAL WORKERS LOCAL 265)	
WELFARE FUND, <i>et al.</i> ,)	
)	
Plaintiffs,)	CIVIL ACTION
)	
vs.)	NO. 07 C 3041
)	
FOUR SEASONS HEATING & COOLING, INC.,)	JUDGE WAYNE R. ANDERSEN
an Illinois corporation,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, FOUR SEASONS HEATING & COOLING, INC., an Illinois corporation, in the total amount of \$345,278.61, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,070.00.

On June 21, 2007, the Summons and Complaint was served on the Registered Agent (by tendering a copy of said documents to Lisa) at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on July 11, 2007. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default judgment.

/s/ Beverly P. Alfon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 19th day of July 2007:

Ms. Dawn J. Franco, Registered Agent
Four Seasons Heating & Cooling, Inc.
56 East End Drive
Gilberts, IL 60136

/s/ Beverly P. Alfon _____

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